

EXHIBIT 2

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 Richmond Division</p> <p>4 -----+</p> <p>5</p> <p>6 ePLUS iNC., </p> <p>7 Plaintiff, </p> <p>8 Civil Action No.</p> <p>9 vs. 3:09-CV-620 (JRS)</p> <p>10 LAWSON SOFTWARE, INC., </p> <p>11 Defendant. </p> <p>12 -----+</p> <p>13</p> <p>14 Videotaped Deposition of PAMELA ENG</p> <p>15 Washington, DC</p> <p>16 May 25, 2010</p> <p>17 10:33 a.m.</p> <p>18</p> <p>19</p> <p>20 Job No. 1-179503</p> <p>21 Pages 1 - 62</p> <p>22 Reported by: Michele E. Eddy, RPR, CRR, CLR</p>	<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFF:</p> <p>4 SCOTT L. ROBERTSON, ESQUIRE</p> <p>5 Goodwin Procter</p> <p>6 901 New York Avenue, Northwest</p> <p>7 Washington, DC 20001</p> <p>8 Telephone: (202) 346-4000</p> <p>9</p> <p>10 ON BEHALF OF THE DEFENDANT:</p> <p>11 WILLIAM D. SCHULTZ, ESQUIRE</p> <p>12 Merchant & Gould</p> <p>13 3200 IDS Center</p> <p>14 80 South Eighth Street</p> <p>15 Minneapolis, Minnesota 55402</p> <p>16 Telephone: (612) 332-5300</p> <p>17</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 Cali Day, Videographer</p> <p>21</p> <p>22</p>
<p>1 Videotaped Deposition of</p> <p>2 PAMELA ENG</p> <p>3</p> <p>4 Held at the offices of:</p> <p>5</p> <p>6 GOODWIN PROCTER, LLP</p> <p>7 901 New York Avenue, Northwest</p> <p>8 Washington, DC 20001</p> <p>9 (202) 346-4000</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 Pursuant to Notice, before Michele E. Eddy,</p> <p>17 Registered Professional Reporter, Certified Realtime</p> <p>18 Reporter, and Notary Public in and for the District of</p> <p>19 Columbia.</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 EXAMINATION INDEX</p> <p>2 PAGE</p> <p>3 EXAMINATION BY MR. ROBERTSON 8</p> <p>4</p> <p>5</p> <p>6 E X H I B I T S</p> <p>7 (Attached to the Transcript)</p> <p>8 DEPOSITION EXHIBIT PAGE</p> <p>9 Exhibit 1 Notice and subpoena 9</p> <p>10 Exhibit 2 Engagement letter 14</p> <p>11 Exhibit 3 Materials sent to witness by counsel</p> <p>12 Exhibit 4 Statement of Work 17</p> <p>13 Exhibit 5 Sketch involving TV-2; Bates EPFS000257 27</p> <p>14 Exhibit 6 Bates ePLUS0218032 - 056; entitled 47</p> <p>15 Fisher Electronic Sourcing, Assessment</p> <p>16 and Proposal; dated 2-15-95</p> <p>17 Exhibit 7 Fax transmission cover sheet to Herb 52</p> <p>18 Kem from Charles Gounaris dated 2-14-94;</p> <p>19 Bates ePLUS0212757 - 61; second page</p> <p>20 entitled IBM Agreement for Exchange</p> <p>21 of Confidential Information</p> <p>22 Exhibit 8 Fisher/IBM Master Schedule Plan 56</p>

<p>9</p> <p>1 A Yes.</p> <p>2 Q Okay. Did you search for and identify and</p> <p>3 produce any communications you had with them?</p> <p>4 A No.</p> <p>5 (Exhibit 1 was marked for identification and</p> <p>6 attached to the deposition transcript.)</p> <p>7 BY MR. ROBERTSON:</p> <p>8 Q I'm going to mark the first exhibit, which</p> <p>9 is going to be the deposition notice and a subpoena.</p> <p>10 I'D ask you if you would take a look at that.</p> <p>11 Have you -- my first question is, after</p> <p>12 you've had a chance to peruse it, have you seen that</p> <p>13 document before, Miss Eng?</p> <p>14 A Yes.</p> <p>15 Q Do you see that there was a subpoena</p> <p>16 attached to it?</p> <p>17 A Yes.</p> <p>18 Q And it asks you to search for certain</p> <p>19 documents. Did you see that?</p> <p>20 A Yes.</p> <p>21 Q Okay. Did you do that?</p> <p>22 A Well, I looked for my folder that I had</p>	<p>11</p> <p>1 date in time; do you recall that?</p> <p>2 A I'm not sure what happened after I left.</p> <p>3 Q Okay. But in any event, when you left IBM,</p> <p>4 you understood that you shouldn't take any documents</p> <p>5 with you; is that right?</p> <p>6 A Right.</p> <p>7 Q IBM has a policy about employees that are --</p> <p>8 that leave the company not to take IBM documents,</p> <p>9 correct?</p> <p>10 A Correct.</p> <p>11 Q Now, when you -- you indicated that -- or at</p> <p>12 least I understood you to indicate that you may have</p> <p>13 obtained some documents at a later time. Is that</p> <p>14 right? Let me rephrase the question.</p> <p>15 If you don't understand my question at all,</p> <p>16 just let me know and I'm try to restate it.</p> <p>17 All right. At some later time you were</p> <p>18 provided some documents, IBM documents, correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. How did you obtain those, if you</p> <p>21 recall?</p> <p>22 A Well, the law firm gave me some of them.</p>
<p>10</p> <p>1 because I did have a lot of documents from the first</p> <p>2 time in the SAP matter, but I couldn't -- I threw it</p> <p>3 away, I think.</p> <p>4 Q Those documents from the SAP matter, they</p> <p>5 were given to you by counsel for SAP at the time in</p> <p>6 that matter, correct?</p> <p>7 A Some of them, yes.</p> <p>8 Q Okay. When you left the employ of IBM, did</p> <p>9 you take any IBM documents with you?</p> <p>10 A No. But I still knew people that -- that</p> <p>11 worked there last time.</p> <p>12 Q But -- let me ask you, when did you leave --</p> <p>13 A 1995.</p> <p>14 Q All right. So that was shortly after this</p> <p>15 electronic sourcing project, that's how I'm going to</p> <p>16 refer to it today if that's all right --</p> <p>17 A Okay.</p> <p>18 Q -- was completed, correct?</p> <p>19 A I don't think it was completely completed.</p> <p>20 Q Okay. There were some additional things</p> <p>21 that -- that occurred, such as transitioning the</p> <p>22 electronic sourcing project to the Internet at a later</p>	<p>12</p> <p>1 Q Okay. Did you contact anybody at IBM in the</p> <p>2 time frame to see if you could obtain documents?</p> <p>3 A Yes.</p> <p>4 Q Who did you speak to?</p> <p>5 A Well, I don't know if he still worked there</p> <p>6 then. I can't remember. I tried to call Al Roland,</p> <p>7 Kevin French, that I can think of.</p> <p>8 Q So let me just break that up. Was</p> <p>9 Mr. French still with IBM back in --</p> <p>10 A No, he was not.</p> <p>11 Q We have to be careful not to talk over each</p> <p>12 other, okay? Because it really makes a mess of the</p> <p>13 record. So just be patient, let me finish and then</p> <p>14 I'll let you give me your answer.</p> <p>15 So Mr. French wasn't with IBM at the time</p> <p>16 you contacted him; is that right?</p> <p>17 A Right.</p> <p>18 Q Did Mr. French have any documents?</p> <p>19 A No.</p> <p>20 Q Was Mr. Roland with IBM at the time you</p> <p>21 contacted him?</p> <p>22 A I can't remember.</p>